

EXHIBIT 32

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NATIONAL COALITION ON BLACK
CIVIC PARTICIPATION, MARY WINTER,
GENE STEINBERG, NANCY HART,
SARAH WOLFF, KAREN SLAVEN, KATE
KENNEDY, EDA DANIEL, and ANDREA
SFERES,

Plaintiffs,

v.

JACOB WOHL, JACK BURKMAN, J.M.
BURKMAN & ASSOCIATES, LLC,
PROJECT 1599, and JOHN and JANE DOES
1-10,

Defendants.

Civil Action No. 20-cv-8668

DECLARATION OF TAMEKA RAMSEY

TAMEKA RAMSEY declares, pursuant to 28 U.S.C. § 1746, as follows:

1. My name is Tameka Ramsey. I am over 18 years of age and am competent to make this declaration.
2. I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.
3. I am the convener of the Metro Detroit affiliate of the Black Women's Roundtable (BWR-MD). I supervise the operations of BWR-MD.
4. BWR-MD is a chapter of the Black Women's Roundtable, an empowerment program from the National Coalition on Black Civic Participation, a

nonprofit organization that works to engage, educate, organize, and mobilize Black Americans of all ages to participate in our democracy. Through educational programs and leadership training, NCBCP works to expand, strengthen, and empower Black communities to make voting and civic participation a cultural responsibility and tradition.

5. One of the primary purposes of the Black Women's Roundtable is to bring together Black women from varying backgrounds and across generations to strategize and organize to strengthen the power of Black women's leadership and to advance a policy agenda focused on the needs of Black women. This includes promoting voting and civic participation.
6. The work of BWR-MD includes grassroots and community organizing in Detroit to promote and support civic participation and advocate for paid leave. This includes helping and encouraging members of the Black community in Detroit to participate in the Census and participate in elections.
7. When BWR-MD heard about the robocalls coming into Michigan from Defendants, we were extremely concerned. This was a voter suppression effort. We knew that deceptive and false information about voting by mail would intimidate and scare the communities BWR-MD serves, especially Black voters.

8. We are also very worried about the risk of COVID-19 to our community.

The virus has hit the Black community disproportionately hard and caused a lot of suffering. BWR-MD worries that these robocalls will intimidate Black voters into voting in person instead of by mail, exposing themselves to greater risk of contracting COVID-19.

9. As a community leader trying to help people vote, I needed to inform my community that the robocalls were false and that voting by mail is safe.


BWR-MD mobilized quickly to respond, which required diverting resources and putting other important work on hold.

10. After Defendants began sending out their robocalls, our Detroit co-chair had to stop her Census work in order to respond to the robocalls. She was encouraging and helping people to fill out their Census forms. She paused that so that she could do outreach to partner organizations and community members to make sure they knew that the robocall was false information. Fewer people participated in the Census because she had to divert her efforts to respond to this robocall.

11. I am concerned that if the robocalls continue, BWR-MD will have to divert additional resources from other programs in order to protect our community's right to vote and help people safely vote by mail.

I declare under penalty of perjury that the foregoing statements are true and correct. Executed on:

October 16, 2020, in Pontiac, Michigan, by



TAMEKA RAMSEY